

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

**IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION**

**THIS DOCUMENT RELATES TO:**

*The County of Summit, Ohio, et al. v.  
Purdue Pharma L.P., et al.,  
Case No. 18-op-45090*

*The County of Cuyahoga, Ohio, et al. v.  
Purdue Pharma L.P., et al.,  
Case No. 17-op-45004*

MDL No. 2804

Case No. 1:17-md-2804

Judge Dan Aaron Polster

**DECLARATION OF RON S. CHIMA**

I, Ron S. Chima, hereby affirm, under penalty of perjury, that I am over 18 years of age and am competent to make the following declaration:

1. I have personal knowledge of the matters stated herein, and they are true and correct to the best of my knowledge, which is based on information I obtained from Rite Aid Hdqtrs. Corp. associates and/or records.

2. I am employed by Rite Aid Hdqtrs. Corp. as Vice President, Litigation & Commercial Law. I have worked at Rite Aid Hdqtrs. Corp. since 2004, and I have worked in my current positions since 2015. I am familiar with the corporate structure and operations of the Rite Aid corporate family, which includes Rite Aid Corporation ("RAC").

3. RAC is organized under the laws of Delaware and has its principal place of business in Pennsylvania.

4. RAC is a holding company with no operations other than those related to its status as a holding company. RAC has no offices, facilities, assets, income, employees, or operations in Ohio, and RAC does not manufacture, distribute, or dispense opioids in Ohio or elsewhere.


5. RAC is not qualified as a foreign corporation under the laws of Ohio, does not have a registered agent for service of process in Ohio, and is not regulated by any Ohio state agency.

6. While RAC has subsidiaries, it is a separate and distinct company from those subsidiaries, each of which observes and enforces corporate formalities. RAC does not have any direct involvement in directing, managing, or supervising the operations or the employees of any of its subsidiary companies, including any of its subsidiaries that ever have engaged in the distribution or dispensing of prescription opioids.

7. Corporate policies and procedures are set by Rite Aid Hdqtrs. Corp. employees.

8. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

EXECUTED on 12/23, 2019.

  
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RON S. CHIMA